ADMINISTRATIVE RECORD INDEX

for the

AGRICO CHEMICAL SITE (OPERABLE UNIT 1) NPL Site

1.0 PRE-REMEDIAL

1.9 Site Inspection Documents

0001

- "Hazardous Waste Site Investigation; Agrico Chemical Company Site; Pensacola, Florida; EPA Project No. 84-002," EPA Region IV Environmental Services Division, Athens, Georgia (October 18, 1983). Concerning investigation carried out by William R. Davis and James Kopotic, EPA Region IV, on October 18, 1983.
- 2. "Potential Hazardous Waste Site Site Inspection Report," William R. Davis, EPA Region IV Environmental Services Division, Athens, Georgia (June 22, 1984).

3.0 REMEDIAL INVESTIGATION (RI)

3.1 Correspondence

- 1. Letter from Bruce W. Youtsey, Conoco Inc., to Patsy Goldberg, EPA Region IV (March 18, 1992). Concerning proposal to install additional monitoring wells east of Bayou Texar to determine whether the plume from the Agrico Chemical Co site impacts Bayou Texar.
 - 2. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (March 31, 1992). Concerning approval by EPA Region IV to install additional monitoring wells east of Bayou Texar.

3.2 Sampling and Analysis Data

 Verified Sampling Data, Chain of Custody Forms and Quality Assurance and Quality Control Documents related to Verified Sampling Data are currently located at EPA Region IV Environmental Services Division, Athens, Georgia. Such documentation will be made available for review upon request sent to the Remedial Project Manager for the Agrico Chemical Superfund Site, Region IV, U.S. EPA, 345 Courtland Street, Atlanta, Georgia 30365.

3.2 Sampling and Analysis Data (cont'd.)

2. Cross-Reference: "Remedial Investigation and Feasibility Study Work Plan; Pensacola Fertilizer Site; Pensacola, Florida," Geraghty & Miller, Inc. for Pensacola Fertilizer Plant Group (June 1, 1990). Concerning Phase I Final Work Plan, including Field Sampling Plan, Quality Assurance Project Plan (QAPP), Generic Quality Assurance Project Plan, Health and Safety Plan, and Contaminant Transport Modeling Plan. [Filed and cited as entry number 8 in 3.4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]

3.4 Work Plans and Progress Reports

- 1. Letter from Laura E. Cummins, State of Florida
 Department of Environmental Regulation, to Patsy
 Goldberg, EPA Region IV (December 13, 1989).
 Concerning comments to the Phase I Remedial
 Investigation Work Plan dated November 1989.
- 2. Memorandum from John A. Lindsay, National Oceanic and Atmospheric Administration (NOAA), to Martha Berry, EPA Region IV (December 15, 1989). Concerning comments to the Phase I Remedial Investigation Work Plan dated November 1989.
- 3. Letter from Patsy Goldberg, EPA Region IV, to Jay S. Christopher, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (January 5, 1990). Concerning comments to the Phase I Remedial Investigation Work Plan dated November 1989.
- 4. Letter from Laura E. Cummins, State of Florida
 Department of Environmental Regulation, to Patsy
 Goldberg, EPA Region IV (February 22, 1990).
 Concerning comments to the Phase I Remedial
 Investigation Work Plan dated November 1989.
- 5. Letter from Patsy Goldberg, EPA Region IV, to Jay S. Christopher, Conoco Inc., and Rusty Walker, Freeport-McMoRan (March 2, 1990). Concerning comments to the Phase I Remedial Investigation Work Plan dated February 1990.
- 6. Letter from Patsy Goldberg, EPA Region IV, to Jay S. Christopher, Conoco Inc., and Rusty Walker, Freeport-McMoRan (April 5, 1990). Concerning comments to the Phase I Remedial Investigation Work Plan dated February 1990.

3.4 Work Plans and Progress Reports (cont'd.)

- 7. Letter from Patsy Goldberg, EPA Region IV, to Jay S. Christopher, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (May 30, 1990). Concerning comments to the Phase I Remedial Investigation Work Plan dated May 1990.
- 8. "Remedial Investigation and Feasibility Study Work Plan; Pensacola Fertilizer Site; Pensacola, Florida," Geraghty & Miller, Inc. for Pensacola Fertilizer Plant Group (June 1, 1990). Concerning Phase I Final Work Plan, including Field Sampling Plan, Quality Assurance Project Plan (QAPP), Generic Quality Assurance Project Plan, Health and Safety Plan, and Contaminant Transport Modeling Plan.
- 9. Letter from Patsy Goldberg, EPA Region IV, to Jay S. Christopher, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie, Thomas, Mayes & Mitchell, P.A. (June 1, 1990). Concerning approval of EPA Region IV for the Phase I Remedial Investigation/Feasibility Study Work Plan dated June 1990 as final.
- 10. Memorandum from John A. Lindsay, National Oceanic and Atmospheric Administration (NOAA), to Patsy Goldberg, EPA Region IV (August 9, 1991). Concerning comments to the Phase II Remedial Investigation Work Plan dated July 1991.
- 11. Letter from Kelsey A. Helton, State of Florida
 Department of Environmental Regulation, to Patsy
 Goldberg, EPA Region IV (September 3, 1991).
 Concerning comments to the Phase II Remedial
 Investigation Work Plan dated July 1991.
- 12. Letter from Patsy Goldberg, EPA Region IV, Jay S. Christopher, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (September 9, 1991). Concerning official disapproval of Phase II Remedial Investigation Work Plan dated July 1991 and transmittal of attached comments.

- 3.4 Work Plans and Progress Reports (cont'd.)
 - 13. Cross-Reference: Letter from Kelsey A. Helton, State of Florida Department of Environmental Regulation, to Patsy Goldberg, EPA Region IV (October 2, 1991). Concerning comments to the Phase I Remedial Investigation Report revised August 1991, and comments to the Phase 2 Remedial Investigation Work Plan. [Filed and cited as entry number 3 in 3.10 REMEDIAL INVESTIGATION (RI) Remedial Investigation (RI) Reports]
- 14. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (December 6, 1991). Concerning official disapproval of Phase II Remedial Investigation Work Plan dated October 1991 and transmittal of attached comments.
- 15. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (January 13, 1992). Concerning comments to the Phase II Remedial Investigation Work Plan revised December 12, 1991.
- 16. "Phase II Remedial Investigation Work Plan; Agrico Chemical Site; Pensacola, Florida," Geraghty & Miller, Inc. (January 20, 1992).
- 17. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark Proctor, Levin, Middlebrooks, Mabie, Thomas, Mayes & Mitchell, P.A. (January 31, 1992). Concerning approval of EPA Region IV for the Phase II Remedial Investigation Work Plan dated January 1992 as final.
- 18. Letter from Andrew M. Miller, Geraghty & Miller, Inc., to Patsy Goldberg, EPA Region IV (May 11, 1992).

 Concerning proposal to implement Bayou Texar Study incorporated into the Phase II Remedial Investigation Work Plan, with a copy of the proposed study attached.
- 19. Letter from John W. Mitchell, Florida Department of Natural Resources, to Patsy Goldberg, EPA Region IV (May 29, 1992). Concerning comments to the proposed Bayou Texar Study incorporated into the Phase II Remedial Investigation Work Plan.

- 3.4 Work Plans and Progress Reports (cont'd.)
- 20. Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration, to Patsy Goldberg, EPA Region IV (May 29, 1992). Concerning comments to the proposed Bayou Texar Study incorporated into the Phase II Remedial Investigation Work Plan.
- 21. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (June 2, 1992). Concerning comments to the Bayou Texar Study.
- 22. Letter from Allison M. Vidal and Andrew M. Miller, Geraghty & Miller, Inc., to Patsy Goldberg, EPA Region IV (June 11, 1992). Concerning response to comments of EPA Region IV to the Bayou Texar Study.
- 23. Letter from Allison M. Vidal and Andrew M. Miller,
 Geraghty & Miller, Inc., to Patsy Goldberg, EPA Region
 IV (June 29, 1992). Concerning revisions to the Bayou
 Texar Study.
 - 3.8 Interim Deliverables
- 1. "Ground-Water Flow Modeling of the Pensacola Fertilizer Plant Site; Escambia County, Florida," Geraghty & Miller, Inc. (April 6, 1990).
 - 2. Cross-Reference: "Remedial Investigation and Feasibility Study Work Plan; Pensacola Fertilizer Site; Pensacola, Florida," Geraghty & Miller, Inc. for Pensacola Fertilizer Plant Group (June 1, 1990). Concerning Phase I Final Work Plan, including Field Sampling Plan, Quality Assurance Project Plan (QAPP), Generic Quality Assurance Project Plan, Health and Safety Plan, and Contaminant Transport Modeling Plan. [Filed and cited as entry number 8 in 3.4 REMEDIAL INVESTIGATION (RI) Work Plans and Progress Reports]
- 3. "RI/FS Oversight Report; TES VIII Work Assignment No. CO4035; Responsible Party Oversight; Agrico Chemical; Pensacola, Florida, Dynamac Corporation (January 28, 1991).
 - 4. Cross-Reference: "Phase II Remedial Investigation Work Plan; Agrico Chemical Site; Pensacola, Florida," Geraghty & Miller, Inc. (January 20, 1992). [Filed and cited as entry number 16 in 3.4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]

3.8 Interim Deliverables (cont'd.)

5. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (February 27, 1992). Concerning approval of the Quality Assurance Project Plan (QAPP) for Phase II of the Remedial Investigation.

3.10 Remedial Investigation (RI) Reports

- 1. Memorandum from John A. Lindsay, National Oceanic and Atmospheric Administration (NOAA), to Patsy Goldberg, EPA Region IV (May 2, 1991). Concerning comments to the Phase I Remedial Investigation Report dated March 1991.
- 2. Letter from Patsy Goldberg, EPA Region IV, to Jay S. Christopher, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (May 31, 1991). Concerning official disapproval of Phase I Remedial Investigation Report dated March 1991 and transmittal of attached compiled comments.
- 3. Letter from Kelsey A. Helton, State of Florida
 Department of Environmental Regulation, to Patsy
 Goldberg, EPA Region IV (October 2, 1991). Concerning
 comments to the Phase I Remedial Investigation Report
 revised August 1991, and comments to the Phase 2
 Remedial Investigation Work Plan.
- 4. Letter from Patsy Goldberg, EPA Region IV, to Jay S. Christopher, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (October 25, 1991). Concerning comments to the Phase I Remedial Investigation Report revised August 1991.
- 5. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (January 27, 1992). Concerning comments to the Phase I Remedial Investigation Report revised December 1991.
- 6. "Final Phase I Remedial Investigation; Agrico Chemical Site; Pensacola, Florida; Volume I of III, "Geraghty & Miller, Inc. (March 12, 1992). Concerning Phase I Remedial Investigation Report plus Appendices A through C.

3.10 Remedial Investigation (RI) Reports (cont'd.)

- 7. "Final Phase I Remedial Investigation; Agrico Chemical Site; Pensacola, Florida; Volume II of III," Geraghty & Miller, Inc. (March 12, 1992). Concerning Phase I Remedial Investigation Report plus Appendices D and E.
- 8. "Final Phase I Remedial Investigation; Agrico Chemical Site; Pensacola, Florida; Volume III of III," Geraghty & Miller, Inc. (March 12, 1992). Concerning Phase I Remedial Investigation Report plus Appendices F and G (including Risk Assessment).
- 9. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (April 3, 1992). Concerning approval of the Phase I Remedial Investigation Report revised March 1992 as final.
- 10. "Draft Phase II Remedial Investigation; Agrico Chemical Site; Pensacola, Florida; Volume I of III,"

 Geraghty & Miller, Inc., for Conoco Inc. and Freeport-McMoRan (April 29, 1992).
- 11. "Draft Phase II Remedial Investigation; Agrico Chemical Site; Pensacola, Florida; Volume II of III,"

 Geraghty & Miller, Inc., for Conoco Inc. and Freeport-McMoRan (April 29, 1992).
- 12. "Draft Phase II Remedial Investigation; Agrico Chemical Site; Pensacola, Florida; Volume III of III,"

 Geraghty & Miller, Inc., for Conoco Inc. and Freeport-McMoRan (April 29, 1992).

3.11 Health Assessments

1. "Preliminary Health Assessment for Agrico Chemical Company; CERCLIS No. FLD980221857," Agency for Toxic Substances and Disease Registry (ATSDR) (May 31, 1990).

3.12 Endangerment Assessments

1. Letter from Patsy Goldberg, EPA Region IV, to Jay S. Christopher, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (June 27, 1991). Concerning transmittal of attached State of Florida Department of Environmental Regulation coments to the Risk Assessment in the Phase I Remedial Investigation Report dated March 1991.

3.12 Endangerment Assessments (cont'd.)

- 2. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (December 24, 1991). Concerning transmittal of attached memorandum dated December 11, 1991, from Paul White, EPA Headquarters, regarding exposure assessment.
 - 3. Cross-Reference: "Final Phase I Remedial Investigation; Agrico Chemical Site; Pensacola, Florida; Volume III of III," Geraghty & Miller, Inc. (March 12, 1992). Concerning Phase I Remedial Investigation Report plus Appendices F and G (including Risk Assessment). [Filed and cited as entry number 8 in 3.10 REMEDIAL INVESTIGATION (RI) Remedial Investigation (RI) Reports]
- 4. Memorandum from Julie W. Keller, EPA Region IV, to Patsy Goldberg, EPA Region IV (September 28, 1992). Concerning supplement to baseline risk assessment: Remedial goal for arsenic in soil.
 - 5. Cross-Reference: Letter from Allison M. Vidal and Richard E. Bartelt, Geraghty & Miller, Inc., to Patsy Goldberg, EPA Region IV (September 29, 1992).

 Concerning inclusion of arsenic as a target compound in the Record of Decision (ROD). [Filed and cited as entry number 2 in 5.9 RECORD OF DECISION (ROD) Record of Decision (ROD)]

4.0 FEASIBILITY STUDY (FS)

4.1 Correspondence

1. Letter from Allison Vidal and Richard E. Bartelt,
Geraghty & Miller, Inc., to Patsy Goldberg, EPA Region
IV (April 3, 1992). Concerning schedule of events for
the Feasibility Study to comprise both source control
and ground water.

4.4 Work Plans and Progress Reports

1. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (March 31, 1992). Concerning comments to the Treatability Study Work Plan dated March 1992.

- 4.4 Work Plans and Progress Reports (cont'd.)
- 2. "Treatability Study Work Plan; Agrico Chemical Site; Pensacola, Florida," ENRECO, Inc., for Conoco Inc., and Freeport-McMoRan, Inc. (March 31, 1992). Concerning final work plan incorporating comments of EPA Region IV dated March 31, 1992.
- 3. Letter from Kelsey A. Helton, State of Florida Department of Environmental Regulation, to Patsy Goldberg, EPA Region IV (April 1, 1992). Concerning comments to the Treatability Study Work Plan dated March 1992.
 - 4.9 Feasibility Study (FS) Reports
- 1. "Draft Feasibility Study; Agrico Chemical Site; Pensacola, Florida," Geraghty & Miller, Inc., for Conoco Inc. and Freeport-McMoRan, Inc. (April 30, 1992).
- 2. Letter from Allison M. Vidal and Richard E. Bartelt, Geraghty & Miller, Inc., to Patsy Goldberg, EPA Region IV (September 4, 1992). Concerning comments to the Feasibility Study Report.
- 3. Letter from Allison M. Vidal and Richard E. Bartelt, Geraghty & Miller, Inc., to Patsy Goldberg, EPA Region IV (September 22, 1992). Concerning responses to comments of EPA Region IV to the Feasibility Study Report.
 - 4.10 Proposed Plans for Selected Remedial Action
- 1. "Superfund Proposed Plan Fact Sheet: Agrico Chemical Site; Pensacola, Escambia County, Florida," EPA Region IV (July 1992).
- 5.0 RECORD OF DECISION (ROD)
 - 5.9 Record of Decision (ROD)
- 1. "Record of Decision: Operable Unit 1; Agrico Chemical NPL Site; Pensacola, Escambia County, Florida," EPA Region IV (September 29, 1992).
- 2. Letter from Allison M. Vidal and Richard E. Bartelt,
 Geraghty & Miller, Inc., to Patsy Goldberg, EPA Region
 IV (September 29, 1992). Concerning inclusion of
 arsenic as a target compound in the Record of Decision
 (ROD).

5.0 RECORD OF DECISION (ROD)

- 5.9 Record of Decision (ROD) (cont'd.)
- 3. Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA), to Patsy Goldberg, EPA Region IV (October 5, 1992). Concerning review of draft Record of Decision (ROD).
- 4. Memorandum from Winston A. Smith, EPA Region IV, to Joseph R. Franzmathes, EPA Region IV (October 5, 1992). Concerning review of draft Record of Decision (ROD).
- 5. Letter from Paul F. Taylor, Conoco, Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie, Thomas, Mayes & Mitchell, with carbon copies to additional list of addressees (express mail receipts attached) (October 7, 1992). Concerning transmittal of Record of Decision (ROD).

10.0 ENFORCEMENT

10.1 Correspondence

- 1. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (November 29, 1991). Concerning notification that EPA Region IV is assessing stipulated penalties for failure to revise documents in time according to the requirements of the Administrative Order on Consent.
- 2. Letter from Patsy Goldberg, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (December 20, 1991). Concerning notification that EPA Region IV is assessing stipulated penalties for failure to revise documents in time according to the requirements of the Administrative Order on Consent.
- 3. Letter from Joseph R. Franzmathes, EPA Region IV, to Bruce W. Youtsey, Conoco Inc., Rusty Walker, Freeport-McMoRan, and Mark J. Proctor, Levin, Middlebrooks, Mabie (April 28, 1992). Concerning demand for payment of previously-assessed stipulated penalties for failure to revise documents in time according to the requirements of the Administrative Order on Consent.

10.0 ENFORCEMENT

- 10.1 Correspondence (cont'd.)
- 4. Letter from Rusty Walker, Freeport-McMoRan, Inc., to Collection Officer for Superfund (May 14, 1992).

 Concerning transmittal of check in payment of stipulated penalties.

10.11 EPA Administrative Orders

1. Administrative Order by Consent In the Matter Of:
Agrico Chemical Site; Agrico Chemical Company, a
division of Freeport-McMoRan Resource Partners Limited
Partnership, a Delaware corporation; Conoco Inc., a
Delaware corporation; Respondents; Fred L. Vigodsky,
Edwin Walborsky, and James Lamar Dean, d/b/a MARGOD, a
Florida partnership, and F. A. Baird, Jr.; Current
Owners (September 29, 1989).

13.0 COMMUNITY RELATIONS

- 13.6 Community Relations Plans
- 1. "Final Community Relations Plan; Agrico Chemical Superfund Site; Pensacola, Florida," B & V Waste Science and Technology Corp. (May 1990).
 - 13.7 News Clippings and Press Releases
- 1. "EPA Public Meeting/Comment Period," EPA Region IV (DATE UNKNOWN). Concerning announcement of public meeting on proposed source cleanup at the Agrico Chemical site, plus opening of public comment period on proposed plan.
 - 13.8 Public Meetings
 - 1. "Environmental Protection Agency Meeting; Thursday,
 August 13, 1992; 6:30 p.m.; Pensacola, Florida," EPA
 Region IV (August 13, 1992). Concerning public
 meeting to present alternatives and proposed plan for
 source cleanup at the Agrico Chemical site.
 - 13.9 Fact Sheets
- 1. "Superfund Study Begins: Agrico Chemical Superfund Site; Pensacola, Florida," EPA Region IV (June 1990).